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April 26, 2017

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Global Connection Inc. of America
Lifeline Biennial Audit Report
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

In connection with the above-referenced proceeding, pursuant to 47 C.F.R. § 54.420, and in accordance with the Public Notices of April 2, 2014 and September 19, 2014,¹ Global Connection Inc. of America ("Global Connection") encloses its final Lifeline Program Biennial Audit Report ("Report") to the Federal Communications Commission ("FCC"), covering the audit period of January 1, 2015 through December 31, 2015.

Specifically, this Report was conducted by a licensed, certified public accounting firm independent of Global Connection to evaluate Global Connection's compliance with applicable regulations and orders governing the Low-Income Support Mechanism ("Lifeline Program") of the Universal Service Fund as set forth in 47 C.F.R. Part 54, as well as other program requirements, including any state-mandated Lifeline Program requirements (collectively, the "Rules").

A copy of Global Connection's Report is also being submitted today under separate cover to USAC and relevant state commissions. If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,



Burton F. Peebles, Esq.
Associate Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Global Connection Inc. of America

Attachments

cc: Dee DiCicco, CCO

¹ *Wireline Competition Bureau Announces Release of Final Lifeline Biennial Audit Plan*, WC Docket No. 11-42, Public Notice, 29 FCC Rcd (Apr. 2, 2014); *Erratum*, Public Notice, 29 FCC Rcd 11297 (Sept. 19, 2014). The requirement to file a Lifeline Biennial Audit Plan was adopted by the FCC in the *Lifeline Reform Order*, 27 FCC Rcd 6656, released on February 6, 2012.

Independent Accountants' Report
On Applying Agreed-Upon Procedures
Global Connection Inc. of America

To the Management of Global Connection Inc. of America ("GCIOA" or the "Carrier"), the Universal Service Administrative Company ("USAC"), and the Federal Communications Commission ("FCC" or the "Commission"):

We have performed the procedures enumerated in Attachment A, which were agreed to by the FCC's Wireline Competition Bureau ("Bureau") and the Office of Managing Director ("OMD") in the Lifeline Biennial Audit Plan or as otherwise directed by the Bureau, solely to assist you in evaluating Global Connection Inc. of America's compliance with certain regulations and orders governing the Low-Income Support Mechanism (also known as the Lifeline Program) of the Universal Service Fund, set forth in 47 C.F.R. Part 54, as well as other program requirements, including any state-mandated Lifeline requirements (collectively, the Rules) detailed in the Lifeline Biennial Audit Plan for the calendar year ended December 31, 2015.

Global Connection Inc. of America's management is responsible for compliance with the Rules. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by Generally Accepted Government Auditing Standards (GAGAS) issued by the Government Accountability Office (2011 Revision). The sufficiency of these procedures is solely the responsibility of the Bureau and OMD. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment A, either for the purpose for which this report has been requested or for any other purpose.

Specific procedures and related results are enumerated in Attachment A to this report. In compliance with the Lifeline Biennial Audit Plan, this report does not contain any personally identifiable information or individually identifiable customer proprietary network information.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on Global Connection Inc. of America's compliance with the Rules. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of Global Connection Inc. of America, USAC, and the FCC, and is not intended to be, and should not be, used by anyone other than these specified parties. This report becomes a matter of the public record upon filing of the final report with the FCC. The final report is not confidential.

Aprio, LLP

March 17, 2017

Agreed-Upon Procedures Report - Attachment A Global Connection Inc. of America

Attachment A enumerates the agreed-upon procedures for Global Connection Inc. of America, the associated results, and any management responses obtained in relation to the exceptions identified.

OBJECTIVE I: Carrier Obligation to Offer Lifeline

To determine if the Eligible Telecommunications Carrier ("ETC") has procedures in place to make Lifeline services available to qualifying low-income consumers with mandated disclosures regarding requirements to participate in the Lifeline program and procedures for de-enrolling subscribers when they are no longer eligible to receive Lifeline services.

Procedures and findings

1. Aprio inquired of management and obtained Carrier policies and procedures for offering Lifeline service to qualifying low-income consumers as provided by the Carrier in response to Item 4 of Appendix A (Requested Documentation). We examined and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in Appendix F. Aprio noted no discrepancies between the policies and procedures and the Commission's rules.
2. Aprio inspected 10 examples of Carrier marketing materials describing the Lifeline service (i.e., print, audio, video and web materials used to describe or enroll in the Lifeline service offering, including standard scripts used when enrolling new subscribers, and application and certification forms), as provided in response to Items 4, 6, and 7 of Appendix A, and noted if the materials did not include the following:
 - i. The service is a Lifeline service, which is a government assistance program;
 - ii. The service is non-transferable;
 - iii. Only eligible subscribers may enroll;
 - iv. Only one Lifeline discount is allowed per household; and
 - v. GCIOA's name or any brand names used to market the service.

Aprio noted that the inspected marketing materials contained the required information without exception.

3. a. Aprio reviewed the Carrier's responses to the background questionnaire regarding the Carrier's policies for (1) how subscribers notify the Carrier of the subscriber's intent to cancel service or give notification that s/he is no longer eligible to receive Lifeline service and (2) when de-enrollment for such notifications occurs. We verified that these policies are designed to (1) allow subscribers to make the notifications required by 47 C.F.R. § 54.410(d)(3)(ii) and (iv) and (2) prevent the Carrier from claiming ineligible subscribers on the FCC Form 497 or subscribers who wish to cancel service.

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- b. In addition, Aprio called the customer care numbers provided in response to Item 8 of Appendix A. We noted no additional customer care numbers in the marketing materials provided in response to Item 6 of Appendix A, or on the websites provided in response to Item 7 of Appendix A. Aprio notes that (1) each telephone number is operational, and (2) though it uses an interactive voice response (IVR) system, it is possible for an individual to reach a live customer care operator.
4. Aprio inspected applicable policies and procedures regarding de-enrollment from the program, including when GCIOA will de-enroll subscribers based on lack of eligibility, duplicative support, non-usage, and failure to recertify, as further described below:
- ∴
- a. Aprio inspected GCIOA's policy and procedures for de-enrollment where GCIOA has information indicating that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer under 47 C.F.R. § 54.409, as provided in response to Item 4 of Appendix A, as well as de-enrollment letters provided in response to Item 11 of Appendix A. We noted whether the policy and procedures detail the process for communications between the subscriber and ETC regarding de-enrollment, including, but not limited to: (1) notifying subscribers of impending termination of service, (2) allowing subscriber to demonstrate continued eligibility, and (3) termination of service within 30 days for failure to demonstrate eligibility. Based on procedures listed above, Aprio did not identify any areas that are not in compliance with 47 C.F.R. § 54.405(e)(1) of the Commission's rules.
 - b. Aprio inspected the Carrier's policy and procedures for de-enrolling subscribers that are receiving Lifeline service from another ETC or where more than one member of a subscriber's household is receiving Lifeline service (duplicative support). Aprio noted that the policy and procedures state that GCIOA will de-enroll subscribers within 5 business days of receiving notification from USAC program management that a subscriber or a subscriber's household is receiving duplicative Lifeline support, as required by 47 C.F.R. § 54.405(e)(2) of the Commission's rules. No exceptions were noted.
 - c. Aprio inspected the Carrier's policy and procedures for de-enrolling subscribers for non-usage (i.e., where a Lifeline subscriber fails to use Lifeline service for 60 consecutive days), including the process of how the Carrier monitors and identifies subscribers who are non-users of Lifeline service but enrolled in the program, as well as non-usage termination notifications provided in response to Item 18 of Appendix A. We examined the policy and procedures and non-usage termination notifications to verify if the termination notifications explain that the subscriber has 30 days following the date of the impending termination notification to use the Lifeline service. Aprio did not identify any areas that

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are not in compliance with 47 C.F.R. § 54.405(e)(3) of the Commission's rules.

- d. Aprio reviewed the Carrier's policy and procedures for de-enrolling a Lifeline subscriber that does not respond to the Carrier's attempts to obtain recertification, as part of the annual eligibility recertification process, as well as recertification requests provided in response to Item 19 of Appendix A. We examined the policy and procedures and recertification requests to verify if the communications explain that the subscriber has 30 days following the date of the notice to demonstrate continued eligibility or the Carrier will terminate the subscriber's Lifeline service. In addition, Aprio examined the recertification requests and the Carrier's responses to the background questionnaire and verified that the recertification requests were sent by a method separate from the subscriber's bill (if a customer receives a bill from the Carrier). Aprio did not identify any areas that are not in compliance with 47 C.F.R. § 54.405(e)(4) of the Commission's rules.

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OBJECTIVE II: Consumer Qualification for Lifeline

To determine if the ETC has procedures in place to limit Lifeline service to qualifying low-income consumers and ensure that Lifeline service is limited to a single subscription per household.

Procedures and findings

1. Aprio inquired of management and obtained Carrier policies and procedures for limiting Lifeline support to a single subscription per household as provided by the Carrier in response to Item 4 of Appendix A. We examined and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in 47 C.F.R. § 54.409(c) (Appendix F). Aprio did not note any discrepancies between the policies and procedures and the Commission's rule.
2. Aprio reviewed procedures the Carrier has in place to ensure it has accurately completed the FCC Form 497. Because the Carrier does not have such procedures, we inquired of management to describe the process for completing a FCC Form 497. Specifically, we inquired if the process included the following required elements:
 - The position title of the person responsible for obtaining data for the FCC Form 497;
 - The process for determining which subscribers should be included monthly in the FCC Form 497. Document whether the procedures include cut-off or billing cycle dates, subscribers active as of the start or end of the month, etc.;
 - That a corporate officer signature is required for the FCC Form 497;
 - That a verification process exists to perform an independent review, that is, the person reviewing or validating the form's data is different from the person completing the form;
 - Provides the billing system name used to generate completion of the form; and
 - If applicable, describes the process for completing the Tribal Link Up portions of the FCC Form 497.

The process included all of the required elements without exception.

3. Aprio obtained the Subscriber List in response to Item 1 of Appendix A and obtained the Carrier's FCC Form 497(s) for each study area in the selected states for the selected month. We compared the number of subscribers reported on the Form 497(s) to the number of subscribers contained on the Subscriber List for each study area. Aprio noted no discrepancies in the number of subscribers.
4. Aprio used computer-assisted audit techniques to examine the Subscriber List and note duplicate addresses with different subscribers for the three selected states of Georgia, Michigan, and Wisconsin, for May of 2015, combined the listings and used computer-assisted audit techniques to determine addresses that had multiple subscribers. Aprio found 4,221 subscribers

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on duplicate addresses.

5. From the list completed in #4 above, Aprio randomly selected 30 subscribers and requested a one-per-household certification form, or an Independent Economic Household (IEH) worksheet as referred to internally by GCIOA, for each of the selected subscribers using Appendix D. Because subscribers must only complete an IEH worksheet if existing Lifeline recipients reside at the same address, the selected subscribers were not the first subscribers residing at the address based on the Lifeline start date in the subscriber listing. We verified that the selected subscribers indicated as to only receiving one Lifeline-supported service in his/her household by certifying that he/she was unaware of anyone in the applicant's household who may be receiving a Lifeline service benefit. Aprio also verified that the provided one-per-household documentation included the following requirements:
- a. An explanation of the Commission's one-per-household rule;
 - b. A check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households;
 - c. A space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the definition we adopt here today; and
 - d. The penalty for a consumer's failure to make the required one-per-household certification (i.e., de-enrollment).

Aprio notes that items (b) and (c) are located on the application/certification form, rather than the IEH worksheet. As the applicant who receives the IEH worksheet has already certified as to this requirement on the application/certification form, Aprio does not consider this an exception. Even if subscribers enrolled in the program prior to June 2012, the effective date of the one-per-household requirement, at least one subscriber at each address is required to complete an IEH worksheet. Aprio noted no missing or incomplete certifications.

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OBJECTIVE III: Subscriber Eligibility Determination and Certification

To determine if the ETC implemented policies and procedures for ensuring that their Lifeline subscribers are eligible to receive Lifeline services.

Procedures and findings

1. Aprio inquired of management and obtained Carrier policies and procedures for ensuring that its Lifeline subscribers are eligible to receive Lifeline services as provided by the Carrier in response to Item 4 of Appendix A. We examined and compared the Carrier policies and procedures with the Commission's Lifeline rules set forth in 47 C.F.R. § 54.410 (Appendix F).
 - a. Aprio inspected GCIOA's policies and noted that it includes a policy that GCIOA does not retain copies of subscribers' proof of income- or program-based eligibility.
 - b. Aprio inspected GCIOA's policies and noted that it includes a policy or procedure in which GCIOA must fully verify the eligibility of each low-income consumer prior to providing Lifeline service to that consumer and that GCIOA or its agents may not provide the consumer with an activated device intended to enable access to Lifeline service until that consumer's eligibility is fully verified and all other necessary enrollment steps have been completed.
2. Aprio examined GCIOA's policies and procedures for training employees and agents for ensuring that GCIOA's Lifeline subscribers are eligible to receive Lifeline services, including any policies regarding how the company ensures employees and agents have completed the training.

Aprio has provided a summary of the training procedures and policies as follows:

Aprio reviewed the GCIOA enrollment agent training manual. The agent training is facilitated within TalentLMS, a third party web platform. Once a potential field agent's information and ID are verified by SUW, the candidate is given login credentials and assigned two courses, the SUW Field Agent Training and the Company Policies course. Only after the agent logs in and completes both courses may he/she take the compliance test. The agent has three attempts to pass the exam before a re-review of the materials is required. The Lifeline Policies and Procedures training is required to be retaken each year.

Enrollment for subscribers is performed by approved agents using Vcare, an enrollment compliance platform system. Vcare is hosted by CGM, LLC, a third-party software development and data processing firm. Once the applicant's information is entered, Vcare performs an edit check to eliminate duplicates. If the applicant passes the duplicate check, the agent will

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document the customer's eligibility for enrollment in the Lifeline program. If the customer is eligible based on participation in a covered benefit program, the agent must check boxes indicating the program(s) in which the customer is currently a participant. The agent will then provide an IEH form if applicable, and walk the customer through the Lifeline Service Certification and Disclosures. The customer must understand, review, and sign the forms.

Once the Certification and Disclosures form has been completed and the customer's identification and proof of eligibility has been submitted, the order will go to a review queue for auditor approval. Here, a duplicate check is performed within the National Lifeline Accountability Database (NLAD). Activation of Lifeline benefits cannot be completed without the customer passing this duplicate check.

In the Form 497 reimbursement process, a monthly review is performed through Vcare. The review process includes a check to identify and remove duplicates. The subscribers which have passed the duplicate check are then confirmed with the NLAD database. Only subscribers found in the NLAD database will be processed and approved for Form 497 reimbursement.

Processes such as the addition of new subscribers, duplicate checks, and other interactions with NLAD are performed by CGM, therefore agents of the Carrier do not have access to NLAD.

3. Aprio randomly selected 100 subscribers from the Subscriber List, and performed the tests described below:
 - a. Aprio examined the subscriber certification and recertification forms for the first 50 subscribers in the sample selected above (since the error rate was not higher than 5%) and verified that the forms contained the following information:
 - i. Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment, or being barred from the program;
 - ii. Only one Lifeline service is available per household;
 - iii. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
 - iv. A household is not permitted to receive Lifeline benefits from multiple providers;
 - v. Violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program;
 - vi. Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person;
 - vii. Require each prospective subscriber to provide the following information:
 1. The subscriber's full name;
 2. The subscriber's full residential address;
 3. Whether the subscriber's residential address is permanent or temporary;
 4. The subscriber's billing address, if different from the subscriber's

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- residential address;
 - 5. The subscriber's date of birth;
 - 6. The last 4 digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
 - 7. If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in 47 C.F.R. § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
 - 8. If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in 47 C.F.R. § 54.409, the number of individuals in his or her household.
- viii. Require each prospective subscriber to certify, under penalty of perjury, that:
- 1. The subscriber meets the income or program-based eligibility criteria for receiving Lifeline, provided in 47 C.F.R. § 54.409;
 - 2. The subscriber will notify GCIOA within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income or program-based criteria for receiving Lifeline service, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit;
 - 3. If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 47 C.F.R. § 54.400(e);
 - 4. If the subscriber moves to a new address, he or she will provide that new address to GCIOA within 30 days;
 - 5. The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
 - 6. The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge;
 - 7. The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
 - 8. The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to 47 C.F.R. § 54.405(e)(4).

No findings or exceptions were noted for the criteria included for Procedure 3 a listed above .

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- b. Aprio compared GCIOA's subscriber eligibility criteria on the certification and recertification forms to the federal eligibility criteria listed in per 47 C.F.R. § 54.409, as well as any additional state eligibility criteria identified in Item 4 of Appendix A. Aprio did not note any discrepancies.
- c. Aprio verified the subscriber completed all the required elements as identified in Objective III – 3(a) above, including signature and initialing/checkbox requirements contained in the certification and recertification forms.
- d. Aprio examined the subscriber's certification/recertification form to verify the forms are dated prior to the end of the selected Form 497 data month. If the provided subscriber certification/recertification form was the subscriber's initial certification form, we verified that the form is dated prior to or on the same day as the Lifeline start date per the subscriber listing. No discrepancies were noted.
- e. Aprio noted that no subscribers certified to residing on Tribal lands.
- f. Aprio reviewed the list of the data source or documentation GCIOA reviewed to confirm the subscriber's eligibility obtained using Appendix E. We verified the recorded data sources are eligible data sources per 47 C.F.R. § 54.410, such as (1) income or program eligibility databases, (2) income or program eligibility documentation, or (3) confirmation from a state administrator, without exception.

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OBJECTIVE IV: Annual Certifications and Recordkeeping by Eligible Telecommunications Carriers

To determine if ETCs have made and submitted to the Universal Service Administrative Company the required annual certifications, under penalty of perjury, relating to the Lifeline program by an officer of the company and maintained recordkeeping requirements.

Procedures

1. Aprio inquired of management and obtained Carrier policies and procedures for ensuring that the Carrier has made and submitted the annual certifications required under 47 C.F.R. § 54.416 (i.e., FCC Form 555) and 47 C.F.R. § 54.422 (i.e., FCC Form 481) of the Commission's rules, as provided by the Carrier in response to Items 4, 12, and 13 of Appendix A. We examined and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in 47 C.F.R. § 54.416 and 47 C.F.R. § 54.422 (Appendix F).

Aprio did not note any discrepancies between the Carrier's policies and procedures with an effective date of December 31, 2014, and the Commission's rules regarding 47 C.F.R. § 54.416.

Upon inquiring of management about an absence of policies that comply with 47 C.F.R. § 54.422, we were given an updated policies and procedures manual with an effective date of December 31, 2015, which included the requirements of annual reporting under 47 C.F.R. § 54.422.

2. Aprio examined GCIOA's FCC Form 555 that was filed the January following the audit period provided by the Carrier in response to Item 12 of Appendix A. We verified that an officer of GCIOA certified that he/she understands the Commission's Lifeline rules and requirements and that the Carrier:
 - a. Has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services;
 - b. Is in compliance with all federal Lifeline certification procedures; and
 - c. In instances where an ETC confirms consumer eligibility by relying on income or eligibility databases, as defined in 47 C.F.R. § 54.410(f)(2)(i)-(ii), or by relying on a state Lifeline administrator, as defined in 47 C.F.R. § 54.410(f)(3), the representative must attest annually as to what specific data sources the ETC used to confirm eligibility.

Aprio verified all required elements without exception.

3. Aprio examined GCIOA's organizational chart provided by the Carrier in response to Item 5 of Appendix A. We verified that the certifying officer on the FCC Form 555 is an officer per the organizational chart.

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4. Aprio verified that the subscriber count per the FCC Form 555 agrees with the total subscriber count per the February FCC Forms 497 provided by the Carrier in response to Item 15 of Appendix A with the following finding:

	Form 555	Form 497	Variance
Georgia	18,330	18,683	(353)
Michigan	4,140	4,213	(73)
Wisconsin	3,207	3,230	(23)

GCIOA's Response:

The subscriber counts on the 555 are based on the Form 497 that is on-record at USAC at the time the 555 is prepared. Since the submission of the Form 555 in January 2016, subsequent revisions have taken place for data month February 2015, and the revisions in the Form 497s have not been updated through the re-filing of the Form 555. At the time when the Form 555s were filed, the most up-to-date data for subscriber count for data month February 2015 had been used.

5. Aprio verified that the recertification data reported on the FCC Form 555 agrees with the detailed recertification results provided by the Carrier in response to Item 9 of Appendix A without exception.
6. Aprio verified that the non-usage data reported on the FCC Form 555 for the selected month of May 2015, agreed with the detailed non-usage results provided by the Carrier in response to Item 10 of Appendix A without exception.
7. Aprio reviewed the Carrier's Form 481, as provided by the Carrier in response to Item 13 of Appendix A. We verified that GCIOA reported all the information and made all the certifications required by 47 C.F.R. § 54.422(a)(b) without exception.
8. Aprio reviewed any supporting schedules related to the Carrier's FCC Form 481 as provided by the Carrier in response to Items 16 and 17 of Appendix A. As GCIOA was not granted the ETC designation by the FCC, schedules supporting the number of outages and complaints are not required.
9. Aprio inquired of management and obtained Carrier policies and procedures for maintaining records that document compliance with the Lifeline program rules, as provided by the Carrier in response to Item 4 of Appendix A. We examined and compared the Carrier policies and procedures, including any management responses, with recordkeeping rules set forth in 47 C.F.R. § 54.417. Aprio noted no discrepancies between the policies and procedures and the Commission's rule.